REMARKS

The undersigned thanks the Examiner for the interview which took place on November 8, 2004. The undersigned has amended the claims as was discussed at the interview (note particularly the revisions in claims 7 and 11. This amendment makes the discussions which took place at the interview of record in the case.

Claims 7, 8,10, 11 and 14 are currently active in the application. By the present amendment, in order to clarify the distinguishable features of the present invention claims 7, 8, 10, 11 and 14 have been amended, and claims 9,12-13 were canceled. The support for the present amendments can be found at least on pages 6 to 12 of the specification and Figures 1 to 7. No new matter has been presented by this amendment. Reconsideration of the application in a view of the above amendments and following remarks is respectfully requested.

Claims 7-14 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Brisebois at al. (U.S. Patent 6,369,803) in view of Kraft et al. (U.S. Patent 6,487,424). This rejection is respectfully traversed.

As was discussed in the previous response, the main purpose of the present invention is to provide a device wherein a user can input desired information (function command, number or text) only looking at a display and without seeing keys. In order to reach this objective, the Applicant proposes a set of function, number and character selecting keys with an ability to work in a pressure-sensitive mode. This means that a gentle touch of any of a key generates an image on the display which is assigned to this key, and when a desired image is displayed the definite selection of this image is performed by a more powerful pressure being applied to the touched key.

The Examiner takes the position that the combination of the references to Brisebois at al. and Kraft et al. can create the invention proposed by the Applicant. Specifically, the Examiner points out in the Office Action that Brisebois et al. teaches almost all features of the claimed

invention besides scrolling through the functions by successively and automatically displaying a plurality of functions, numbers and characters assigned to the touched key. Applicant respectfully disagree that the combination of Brisebois et al. and Kraft et al. can create a device wherein any kind of information can be entered without seeing keys.

The reference to Brisebois et al. shows an active edge user interface positioned near a perimeter of a display. Please note that Brisebois et al. uses this pressure sensitive active edge interface only for highlighting on the screen the information already stored in memory of the device and displayed on the device. It is not used for entering new data, but only for selecting from a list or menu. Second, it is very important that for selection of a desired item from the list displayed Brisebois et al. proposes to "... touch or slight pressure on active edge input device 520 adjacent the name..". As discussed at the interview, in order to press precisely the area adjacent to a desired item in Brisebois et al. device on the display a user needs to see a key (here the active edge interface), which is not necessary in the claimed invention. Brisebois et al. eventually supplies legends for areas on the active edge and both the display and active edge, must be viewed for selection. Additionally, scrolling in Brisebois et al. is highlights items presented one after the other on the screen. In contrast, as was discussed at the interview, in the present invention when a user presses a button which is associated with several characters they are successively presented on the screen without highlighting. According to the present invention, if a user would like to select one of the successively shown items he/she presses a key with higher pressure without highlighting. This feature has been reflected in amended claims 7 and 11 by revising them the to recite, "... selecting definitely a desired character by pressing said touched key with a pressure exceeding a predetermined pressure during said successive displaying of characters assigned to the one of touched information data input keys;" (Emphasis added)

Furthermore, according to Brisebois et al. only the active edge

interface has a pressure-sensitive ability. The rest of the keys do not have this feature. Therefore, it can be concluded that the device taught by Brisebois et al. does not actually teach inputting information to an apparatus. Rather, Brisebois shows activating the information from the apparatus memory using the active edge interface. It is clear that, for instance, one cannot enter absolutely new telephone number and related name using only a display and an active edge interface if these phone number and name have not been previously stored in the memory.

In addition, the claimed invention combines different techniques for displaying of options and their selection, such as full presentation of functions and selection of a desired one by moving a cursor, selection of number by pressing an appropriate key, and successively displaying of a plurality of characters during text inputting. The references relied on by the Examiner do not show such a combination.

The Examiner also asserts that the reference to Kraft et al. shows scrolling function wherein functions, numbers and characters assigned to the touched key can be shown on the display successively and automatically at a predetermined interval. The Examiner refers to Figure 8 and lines 51-52 of column 14 and lines 3-4 of column 15. However, the citation in column 15 clearly states that in order to navigate and select among displayed items, different keys are used (Select key 40 and scroll key 41), which is different from the Applicant's approach wherein the same key is used for displaying (preliminary selection) and definite selection of the item on the display. Additionally, due to the existence of the different function keys in Kraft et al. the visibility of a keypad is a necessary condition for entering information. Therefore, no reference teaches a device wherein the information can be entered by blind method.

The basic considerations proposed by MPEP which apply to obviousness rejection:

(A) The claimed invention must be considered as a whole;

(B) The references must be considered as a whole and must suggest the desirability and thus the obviousness of making the combination;

(C) The references must be viewed without the benefit of impermissible hindsight vision afforded by the claimed invention; and

(D) <u>Reasonable expectation of success is the standard with which obviousness is determined</u>.

The combination of Brisebois et al. and Kraft et al. cannot create a device wherein the information can be entered by looking only on display without seeing keys. Therefore, the combination proposed by the Examiner cannot provide a sufficient support for 35 U.S.C. §103 rejection.

In the Office Action the Examiner indicated that the argument presented in the previous response is not persuasive. Specifically, the Examiner states that previously pointed out by the Applicant fact that Kraft teaches the different keys usage for scrolling and entering information is not reflected in the Applicant's claims. Responding to the Examiner's objection by the present amendment claims 7, 8, 10, 11 and 14 have been amended and claims 9, 12-13 were canceled. Generally, the claim language has been improved to emphasize the features of the present invention. Additionally, by the present amendment the term "scrolling" in claim language has been replaced with the term "displayed successively", which accurately describes an operation of viewing of multiple characters assigned to a particular key.

The following features of the present invention have been highlighted by the present amendment:

- the present invention provides a device for inputting functions, numbers or characters wherein a user only looking on the display and does not need to see the keys;

- all key in the present invention including function-selecting keys and number/character-selecting keys can work in a pressure-sensitive mode;

- scrolling through the multiple functions, numbers and characters assigned to a particular key is performed by displaying functions, numbers and characters one by one not by a whole list;

- for displaying and definitely selecting a particular function, number or character the same key is used during successive displaying.

In a view of the above the Applicant respectfully draws the Examiner's attention to claim 7 which now particularly states,

" A method for inputting function, commands or number or character ~~information~~ only watching a display and without seeing keys to an apparatus having a display, one or more function keys and a limited number of information data input keys, wherein all of said function keys and all of information data input keys can work in a pressure-sensitive mode, said method comprising the steps of:

sensing an operation of said one or more function keys and information data input keys in order to display one of a function-selecting scene, a number-inputting scene or a character inputting scene on said display;

displaying said function-selecting scene comprising a plurality of function items corresponding to said function-selecting keys in response to touching one of said function-selecting keys;

selecting a desired function by shifting a cursor to an item corresponding to the touched function-selecting key;

displaying successively functions assigned to the touched function-selecting key by continuously touching one of said function-selecting keys;

selecting definitely the item specified by the cursor by pressing the touched function-selecting key with a pressure exceeding a predetermined pressure;

displaying said number-inputting scene in response to touching one of said function-selecting keys;
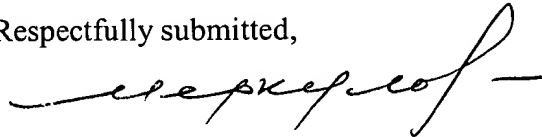
selecting definitely a desired number by pressing said touched key with a pressure exceeding a predetermined pressure;

displaying said character-inputting scene in response to touching one of said information data input keys;

displaying successively characters assigned to the touched information data input keys by continuously touching one of said information data input keys;

selecting definitely a desired character by pressing said touched key with a pressure exceeding a predetermined pressure **during said successive displaying of characters assigned to the one of touched information data input keys;** and

displaying the selected definitely function, number or character on the display." (Emphasis added)

In view of the foregoing, it is respectfully requested that the application as amended be reconsidered, that claims 7, 8, 10, 11 and 14 be allowed, and that the application be passed to issue.

Should the Examiner find the application to be other than in condition for allowance, the Examiner is requested to contact the undersigned at the local telephone number listed below to discuss any other changes deemed necessary in a telephonic or personal interview.

A provisional petition is hereby made for any extension of time necessary for the continued pendency during the life of this application. Please charge any fees for such provisional petition and any deficiencies in fees and credit any overpayment of fees to Attorney's Deposit Account No. 50-2041 (Whitham, Curtis & Christofferson, P.C.).

Respectfully submitted,

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